



May 16, 2022

Chief Judge Barbara M. G. Lynn
United States District Court for the Northern District of Texas
1100 Commerce Street, Room 1572
Dallas, Texas 75242-1003

Re: *Association of Club Executives of Dallas, Inc. et al. v. City of Dallas*,
Civil Action No. 3:22-CV-00177-M

To The Honorable Court:

On the last day of the hearing on Plaintiffs' motion for a preliminary injunction, the Court instructed the City of Dallas to inform the Court if the City's informal agreement not to enforce section 41A-14.3 of the Dallas City Code until a ruling on the motion is issued becomes problematic for the City. The City writes to inform the Court that, within the last month, there have been four shootings at or related to sexually-oriented businesses between the hours of 4:00 am and 5:30 am. In all four incidents, individuals were injured in the shootings, and in the most recent incident, one individual was killed.

These incidents that have occurred since the conclusion of the preliminary injunction hearing are placing the City in an increasingly difficult position, as it has now been nearly four months since the ordinance was passed by the Dallas City Council. The City is concerned about the potential for violent criminal incidents during the upcoming Memorial Day holiday weekend.

Consequently, unless the City receives further instruction from the Court, this will serve as notice to the Court and plaintiffs that the City would like to begin enforcement of the hours of operation regulation on Thursday, May 26, 2022.

Thank you for your consideration of the City's concerns.

Sincerely,

/s/ Stacy Jordan Rodriguez
Assistant City Attorney

Cc: All Counsel of Record